

ROSSMAN LAW FIRM, LLC

180 Montague Street, Suite 29E
Brooklyn, New York 11201
Phone: 973-722-3315
Email: tar@rossmanlawfirm.com
W: www.rossmanlawfirm.com

Todd A. Rossman, Esq.
Licensed in New York and New Jersey

New Jersey Office:
36 Cattano Avenue, Suite 6000
Morristown, New Jersey 07962

March 5, 2020

VIA ECF

Hon. Brian M. Cogan, U.S.D.J.
United States District Court for the Eastern District of New York
225 Cadman Plaza East
Chambers 704S
Brooklyn, New York 11201

Re: Munoz v. 640, LLC
Civil Action No.: 1:19-cv-5751-BMC

Dear Judge Cogan:

This firm represents Defendants in the above matter. We respectfully submit this correspondence as a status update and a joint request for an additional sixty (60) days to complete fact discovery.

By way of background, this is a personal injury matter involving three Plaintiffs stemming from an October 2, 2018 motor vehicle accident. The current fact discovery end date is March 7, 2020. As of today, Plaintiffs have produced written discovery responses and initial document production. We have completed the depositions of two Plaintiffs and both were full day affairs as Spanish interpreters were needed. We have scheduled the third Plaintiff's deposition for this Monday, March 9, 2020. With respect to one of the Plaintiffs, we served a post-deposition Notice to Produce for medical records from providers who were not listed in discovery responses. Plaintiff's counsel, Zachary Rozenberg, Esq., is working on responses now. Mr. Rozenberg wants to depose my client and I have reached out to schedule a date. We are confident this deposition will be completed by the end of March.

My office has scheduled orthopedic Independent Medical Examinations with Dr. Jeffrey Klein for April 20, 2020 for all three Plaintiffs. Dr. Klein's office has advised of a 6-week turnaround time for issuing reports.

There may be a need for liability and insurance fraud experts; however, we need to complete the Plaintiffs' depositions before making the final determination.

On a personal note, I will be moving offices at the end of March and anticipate 1-2 weeks to become fully integrated.

Based on the foregoing, we are making a joint request for an additional sixty (60) days, until May 7, 2020, to complete fact discovery with the court scheduling a conference call for the beginning of May 2020 to discuss expert discovery deadlines.

I have conferred with Mr. Rozenberg and he has reviewed and approved this application.

Respectfully submitted,

/s/ Todd A. Rossman

Todd A. Rossman

cc: Zachary Rozenberg, Esq. – via email and ECF